

NICHOLS KASTER, LLP  
Matthew C. Helland, CA Bar No. 250451  
helland@nka.com  
One Embarcadero Center, Suite 720  
San Francisco, CA 94111  
Phone: (415) 277-7235  
Fax: (415) 277-7238

BERGER & MONTAGUE, P.C.  
E. Michelle Drake, MN Bar No. 0387366\*  
emdrake@bm.net  
John G. Albanese, MN Bar No. 0395882\*  
jalbanese@bm.net  
43 SE Main Street, Suite 505  
Minneapolis, MN 55414  
Phone: (612) 594-5999  
Fax: (215) 875-4604

GOTTLIEB & ASSOCIATES  
Jeffrey M. Gottlieb, NY Bar No. JG-7905\*  
nyjg@aol.com  
Dana L. Gottlieb, NY Bar No. DG-6151\*  
danalgottlieb@aol.com  
150 East 18th Street, Suite PHR  
New York, NY 10003  
Phone: (212) 228-9795  
Fax: (212) 982-6284  
\*admitted *pro hac vice*  
Attorneys for Individual and Representative Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ERIC HALVORSON, LAURA FERRER,  
PETER DALLMAN, ROBERT GRANA,  
DENNIS BULCAO, and NEIL YOUNG,  
individually, and as representatives of the  
classes,

Plaintiffs,

v.

TALENTBIN, INC.,

Defendant.

Case No.: 3:15-cv-05166-JCS

**DECLARATION OF NEIL YOUNG**

Date: July 14, 2017  
Time: 9:30 AM  
Location: Courtroom G, 15th Floor  
Judge: Hon. Joseph C. Spero

Case No.: 3:15-cv-05166-JCS

YOUNG DECLARATION

1 I, Neil Young, hereby declare as follows:

2 1. I am over the age of eighteen and I have personal knowledge of the facts  
3 set forth in this Declaration, and if called as a witness for this purpose, I could and would  
4 testify competently under oath to them.

5 2. I am a Named Plaintiff in the above-captioned action. I submit this  
6 Declaration in support of Plaintiffs' Unopposed Motion for Attorneys' Fees, Costs, and  
7 Class Representative Service Payments.

8 3. My interests in this matter are not opposed to the interests of the Settlement  
9 Class and I am unaware of any conflicts of interest between myself and the Class. I  
10 understand what it means to be a class representative and have put the interests of the  
11 class members first in making all decisions related to this case.

12 4. I have reviewed the terms of the settlement in this matter and I support the  
13 settlement.

14 5. I assisted my attorneys with the investigation of the claims asserted in this  
15 action, answered discovery, participated in phone calls with counsel and provided copies  
16 of documents, and was prepared to travel and sit for my deposition. I have been engaged  
17 throughout this litigation and been available for any questions or information my attorneys  
18 needed.

19 The foregoing statement is made under penalty of perjury and is true and correct to the  
20 best of my knowledge and belief.

21 Date: 2/28/2017

22 Neil Young  
Neil Young